

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001**

Transferring Bound Printed Matter
Parcels to the Competitive Product List

Docket No. MC2021-78

**MOTION OF PARCEL SHIPPERS ASSOCIATION
FOR ISSUANCE OF INFORMATION REQUEST
(April 26, 2021)**

Pursuant to 39 CFR §§ 3010.160(a) and 3010.170(e), Parcel Shippers Association (PSA) respectfully requests that the Presiding Officer issue an information request to obtain additional clarifying data and information from the Postal Service concerning its request¹ to transfer Bound Printed Matter (BPM) Parcels from the Market Dominant product list to the Competitive product list.

The questions below seek information relevant to whether, in fact, the Postal Service exercises sufficient market power to avoid losing business to other firms if it sets the price for BPM Parcels substantially above costs, raises prices significantly, decreases quality or decreases output.

Respectfully submitted:

/s/ James Pierce Myers

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¹ United States Postal Service Request to Transfer Bound Printed Matter Parcels to the Competitive Product List (March 26, 2021) ("Request").

PROPOSED QUESTIONS

1. Please populate the table below with Parcel Select Lightweight volumes by fiscal year.

Fiscal Year	Parcel Select Lightweight Volume
FY 2012	
FY 2013	
FY 2014	
FY 2015	
FY 2016	
FY 2017	
FY 2018	
FY 2019	
FY 2020	

2. Has the Postal Service had any negotiated service agreements (NSAs) in effect that include discounted Parcel Select Lightweight prices? If so:
 - a. What percentage of Parcel Select Lightweight volume was entered at discounted NSA rates in FY 2020?
 - b. What percentage of Parcel Select Lightweight volume was entered at discounted NSA rates in the first two quarters of FY 2021?
3. Please provide all available estimates of the cost coverage of the Parcel Select Lightweight product for each fiscal year from FY 2012 to FY 2020.